

**EXHIBIT B**  
**PARTY EXHIBIT COVER SHEET**

Name of Party			The DRA Parties <sup>1</sup>
Does the Party intend to offer a witness?			Yes
Total Number of Witnesses			At least 4
Witness Name <sup>2</sup>	Expert or Fact Witness	Is interpreter required?	Scope of Testimony <sup>3</sup>
Douglas J. Brickley	Expert	No	Direct, re-direct, or possible rebuttal testimony regarding the clawback the Commonwealth conducted in purported reliance on article VI section 8 of the Puerto Rico Constitution.
Lizette Martínez	Expert	No	Direct, re-direct, or possible rebuttal testimony regarding the flow of funds from the Commonwealth to HTA.

<sup>1</sup> The DRA Parties include AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds that the DRA issued pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018, and the approved qualifying modification for the Government Development Bank for Puerto Rico (the “GDB”) under Title VI of PROMESA, Dkt. No. 270 of Civil Case No. 18-01561 (LTS) (Nov. 7, 2018).

<sup>2</sup> This case is “the largest proceeding to restructure debt in the history of the American municipal bond market.” *Assured Guar. Corp. v. Fin. Oversight & Mgmt. Bd. for P.R. (In re Fin. Oversight & Mgmt. Bd. for P.R.)*, 872 F.3d 57, 64 (1st Cir. 2017). It was commenced nearly four and a half years ago, on May 9, 2017. Dkt. No. 1. Discovery opened only 81 days ago, and required (subject only to exceptions provided by the Court) discovery to be completed in 49 business days. See Dkt. No. 18394 (“Amended Confirmation Procedures Order”) ¶ 3.

It is impossible to submit a comprehensive list at this time. The FOMB submitted declarations only on Monday, October 25, 2021. See *id.* Further, the DRA Parties submitted their witness list simultaneously with all other parties-in-interest on Friday October 22, 2021, in which they included all of the witnesses that that they presently anticipate potentially examining during their case at trial without the benefit of any of these indications of how other parties-in-interest will approach trial. In this circumstance, it is inevitable that the DRA Parties will need additional or different witnesses for direct, cross, re-direct, and rebuttal than those listed here. Further, the DRA Parties do not know all the issues the Court may decide to hear at trial beyond the confirmation factors in PROMESA § 314(b).

Accordingly, the DRA Parties expressly reserve their right to identify additional witnesses and exhibits based on any developments or unanticipated issues that may arise before and/or during the confirmation hearing.

<sup>3</sup> The descriptions provided herein are illustrative only and the DRA Parties reserve the right to present a different, modified, reduced, or expanded scope of testimony at trial.

David W. Prager	Expert	No	Direct, re-direct, or possible rebuttal testimony regarding whether the Plan is in the best interests of creditors.
Stephen Spencer	Fact	No	Direct, re-direct, or possible rebuttal testimony regarding the quantum and nature of (1) the DRA's prepetition Claim on account of the GDB-HTA Loans and (2) the CW/HTA Claim in Sections 2.2(a), 63.1, and 63.2, and any other relevant section of the Plan.
Document custodians	Fact	Possibly	Direct, cross, re-direct, or rebuttal testimony to authenticate documents the parties producing the documents have refused to authenticate.
<p>The DRA Parties reserve the right to call or cross-examine any witness on any other party's preliminary, amended, or final witness list,<sup>4</sup> including but not limited to:</p> <p>Timothy Ahlberg Fernando Batlle David Brownstein Adam Chepenik Jorge A. Clivilles-Diaz Jay Herriman Natalie Jaresko Sheva Levy Gaurav Malhotra Marti P. Murray Christina Pullo Juan Santambrogio Ojas N. Shah David A. Skeel, Jr. Cecile Tirado Andrew Wolfe Steve Zelin</p>	Fact, Mixed, or Expert	Possibly	Cross-examination relevant to the DRA Parties' case at trial.

<sup>4</sup> By listing an individual here, the DRA Parties do not accept that any such individual is qualified to testify in any respect or that any party has the right to call such witness at trial; and hereby reserve all rights to object to any such

Rebuttal witnesses			Consistent with Amended Confirmation Procedures Order ¶ 4, the same or additional witnesses as those listed herein “to rebut testimony offered or adduced at the Confirmation Hearing.”
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testimony.